

Regina Calcaterra
Janine L. Pollack
CALCATERRA POLLACK LLP
1140 Avenue of the Americas, 9th Floor
New York, NY 10036-5803
Tel: (212) 899-1760
Email: rcalcaterra@calcaterrapollack.com
jpollack@calcaterrapollack.com

BERGER MONTAGUE PC
Sherrie R. Savett
Michael Dell'Angelo
Andrew Abramowitz
Donnell Much
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3000
Email: ssavett@bm.net
mdellangelo@bm.net
aabramowitz@bm.net
dmuch@bm.net

*Attorneys for Proposed Lead Plaintiffs
Movants Antonio Sierra Hernandez,
Jeremy Spears, and Christopher Wu
And Proposed Lead Counsel for the Class*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

NEIL DARISH, Individually and on behalf of
all others similarly situated,

Plaintiff,

v.

NORTHERN DYNASTY MINERALS LTD.,
RONALD WILLIAM THIESSEN, MARK C.
PETERS, MARCHAND SNYMAN, and
TOM COLLIER,

Defendants.

Case No. 1:20-cv-05917-ENV-RLM

CHARLES HYMOWITZ, Individually and
on behalf of all others similarly situated,

Plaintiff,

v.

NORTHERN DYNASTY MINERALS LTD.,
RONALD WILLIAM THIESSEN, MARK C.
PETERS, MARCHAND SNYMAN, and
TOM COLLIER,

Defendants.

Case No. 1:20-cv-06126-PKC-RLM

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the concurrently filed Declaration of Janine Pollack, Esq., the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court, proposed Lead Plaintiff Movants Antonio Sierra Hernandez, Jeremy Spears, and Christopher Wu (“Movants”) hereby move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for the entry of an Order: (i) consolidating the actions; (ii) appointing Movants as Lead Plaintiff; (iii) approving Movants’ selection of Berger Montague PC as Lead Counsel and Calcaterra Pollack LLP as Liaison Counsel for the Class; and (iv) granting such other and further relief as the Court may deem just and proper.

Dated: February 2, 2021

Respectfully submitted,

/s/ Janine L. Pollack

Regina Calcaterra

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dmuch@bm.net

***Attorneys for Lead Plaintiff Movants
Antonio Sierra Hernandez, Jeremy Spears,
and Christopher Wu and Proposed Lead
Counsel for the Class***

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Janine L. Pollack
Janine L. Pollack